

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**CATHOLIC MEDICAL ASSOCIATION,**  
on behalf of itself and its members,

Plaintiff,

**Civil Action No. 3:25-cv-00048**

v.

Judge Campbell  
Magistrate Judge Frensley

**UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES;  
ROBERT F. KENNEDY JR.,** in his official  
capacity as Secretary of Health and Human  
Services; **CENTERS FOR MEDICARE &  
MEDICAID SERVICES (CMS);  
MEHMET OZ,** in his official capacity as  
Administrator of the Centers for Medicare &  
Medicaid Services of the United States  
Department of Health and Human Services,

Defendants.

**PROPOSED INTERVENOR-DEFENDANT DOCTORS FOR AMERICA'S  
MOTION FOR LEAVE TO INTERVENE**

Pursuant to Fed. R. Civ. P. 24(a) and (b), Proposed Intervenor-Defendant Doctors for America ("DFA") respectfully moves for leave to intervene as defendant in the above-captioned case. The accompanying Memorandum of Law sets out why the Court should grant the motion. A Proposed Order Granting the Motion for Leave to Intervene is attached as Exhibit 1.

Proposed Intervenor-Defendant has conferred with counsel for Plaintiff and counsel for the Defendants regarding their position on this motion. Counsel for both Plaintiff and Defendants have stated they oppose the motion.

DATE: May 30, 2025.

Respectfully submitted,  
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*Counsel for Proposed Intervenor-Defendant Doctors for America*

*\*Application for admission pro hac vice forthcoming*

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2025, a copy of the foregoing was filed electronically via the Court's ECF system, which effects service upon counsel of record.

/s/Stella Yarborough  
Stella Yarborough